

Erin Lane  
Washington Law Group, PLLC  
10700 Meridian Ave N Ste 109  
Seattle WA 98133  
206-624-3644

Honorable Christopher Alston  
Chapter 7  
Hearing Date: 4/24/2020 at 9:30 am  
Response Date: 4/17/20  
Location Seattle Rm 7206

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

IN RE: )  
 ) Case No. 19-10862  
**Linda Lee Parker,** )  
 ) **MOTION**  
 ) **FOR AN ORDER TO**  
 ) **COMPEL ABANDONMENT**  
**Debtor.** )  
 )

**MOTION**

COMES NOW THE DEBTOR, by and through his attorney, Erin Lane, and moves the Court pursuant to 11 U.S.C. §554(b) to compel the Chapter 7 trustee in this case to abandon the real property located at 31327 12<sup>th</sup> Pl S, Federal Way, WA 98003. In support of the motion, the Debtor sets forth facts and respectfully requests the Court to grant relief as follows:

1. Debtor filed petition under Chapter 13 on March 13, 2019.
2. She converted from Chapter 13 to Chapter 7 on July 11, 2019.
3. Pursuant to 11 U.S.C. §541, the Property became property of the bankruptcy estate.
4. The subject property King County tax parcel ID is 787520-0150 and Legal description is Soundcrest Div #2, Plat Block 5, Plat Lot 4.
5. The Property is of inconsequential value to the bankruptcy estate for the following reasons:
  - a. Debtor obtained a Comparative Market Analysis from a realtor on March 5, 2020.

1 b. The realtor valued the house to sell between \$271,500.00 and \$280,000.00 See  
2 attached Ex A .

3 c. A Mortgage Lien of about \$232,109.68 is held by Mr. Cooper leaving between  
4 \$47,890.32 - \$39,390.32 of equity. A proof of claim was filed with the court on May  
5 13, 2019 as Claim #4 in her chapter 13.  
6

7 d. Debtor has claimed a homestead exemption of \$125,000.00 leaving \$0 of equity for  
8 the bankruptcy estate.

9 6. Debtor therefore respectfully asserts that an order of abandonment is appropriate.

10 WHEREFORE, Debtor requests the entry of an order of abandonment of the Property from the  
11 bankruptcy estate pursuant to 11 U.S.C. §554(b) and for such other and further relief as is just.

12  
13 /s/Erin Lane

14 Erin Lane, WSBA #42504

15 Attorney for Debtor  
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